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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

Maria Shaw,

Plaintiff,

vs.

**The Vons Companies Inc. a foreign
corporation, dba Vons, Safeway, Inc.,
a foreign corporation, DOES I through
X; and ROE CORPORATIONS I through X,
inclusive,**

Defendants.

Case No.: 2:24-cv-00132-RFB-DJA

**Stipulation and Order to Extend
Discovery (Fourth Request)**

Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-3, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the discovery deadlines in the operative discovery plan [ECF No.28], as set forth below.

A. Pursuant to LR ²⁶⁻³~~26-4~~(a), the parties stipulate that the following discovery was completed:

1. The parties have served initial disclosures pursuant to FRCP 26(a)(1) and



supplements thereto;

2. Plaintiff has propounded written discovery on Defendants;
3. Defendants have propounded written discovery on Plaintiff;
4. Plaintiff has answered written discovery requests;
5. Defendants' have answered written discovery requests;
6. Deposition of Plaintiff.

26-3

B. Pursuant to LR ~~26-4~~(b), the parties stipulate that they need to complete the following discovery:

1. Deposition of Defendants;
2. Deposition of percipient witnesses;
3. Initial and Rebuttal Expert Disclosures;
4. Deposition of Defendants' FRCP 30(b)(6) witnesses and/or employees;
5. Depositions of Plaintiff's medical providers;
6. Depositions of each party's respective experts;
7. Additional Written Discovery; and
8. Any other discovery that may become necessary upon completion of the discovery above.

26-3

C. Pursuant to LR ~~26-4~~(c), the parties stipulate an extension is needed for the following reasons:

The parties have been diligent in conducting discovery thus far. Notwithstanding this fact, there have been several impediments to completing the necessary discovery within the current discovery period.

Specifically, the parties have been working together to schedule the depositions of the FRCP 30(b)(6) witnesses and due to unforeseen circumstances have had to reschedule the deposition a few times. It is imperative for Plaintiff to have the depositions of the FRCP 30(b)(6) witnesses in advance of the initial expert disclosure deadline. Vons is entering the busiest time of the year for the grocery store, which is



1 Halloween through Valentine's Day; therefore, the store's factual witness(es) and or
2 30b6 deponent(s) are not available until mid-February. Due to the parties' respective
3 schedules, and the upcoming holidays, the parties now need additional time to
4 conduct the depositions in advance of the deadline to disclose experts.

5 Based on the outstanding discovery still needed and the pending motions before
6 the Court, there is good cause to extend the discovery deadlines ninety (90) days.

7 ²⁶⁻³
8 **D. Pursuant to LR ~~26-4~~(d), the parties stipulate to the following proposed**
9 **schedule for completing all remaining discovery:**

10 The parties agree to extend all the discovery deadlines in this case by ninety (90)
11 days, as set forth below:

- 12 1. Extend the discovery cut-off deadline from 4/28/25 to 7/28/25;
 - 13 2. Extend the deadline to amend the pleadings and add parties from 2/27/25 to
14 5/27/25;
 - 15 3. Extend the date for initial expert disclosures from 2/27/25 to 5/27/25;
 - 16 4. Extend the date to disclose rebuttal expert witnesses from 3/31/25 to 6/30/25;
 - 17 5. Extend the date to file dispositive motions from 5/28/25 to 8/26/25; and
 - 18 6. Extend the date to file the Joint Pre-Trial Order from 6/30/25 to 9/29/25. If
19 dispositive motions are filed, the joint pretrial order is due thirty (30) days from
20 the entry of the court's ruling on the motions.
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7. Fed. R. Civ. P. 26(a)(3) Disclosures must be included in the Joint Pre-Trial Order.

DATED this 28th day of October, 2024

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BACKUS | BURDEN

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/s/ Jacquelyn Franco

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The Vons Companies, Inc and Safeway,

Attorneys for Plaintiff

Inc.

IT IS SO ORDERED.

Dated: 10/29/2024

A blue ink signature of the United States Magistrate Judge, written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE